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Attorneys for Select Portfolio Servicing, Inc. as
Servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture
trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

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	: CASE NO.: 22-11904-elf
	:
In re:	: CHAPTER: 13
	:
Patricia A Brown aka Patricia Anne Brown	: HON. JUDGE.:
aka Pat Brown aka Patricia A. Tucker	: Eric L. Frank
Debtor.	:
	: HEARING DATE:
	: October 18, 2022 at 10:00 am
	:
	:

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NOTICE OF OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that Select Portfolio Servicing, Inc. as Servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4 (“Secured Creditor”), the holder of a mortgage on real property of the Debtor located at 4 Sweetbriar Road, Coatesville, PA 19320, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor’s proposed plan is insufficient to provide for the claim of Secured Creditor. The objecting creditor is due arrears of approximately \$51,533.34 to be set forth in a Claim to be filed by the Claims Deadline.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), et seq. unless the plan provides for full payment of the claim.

Dated: Garden City, NY
September 13, 2022

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Select Portfolio Servicing, Inc. as
Servicer for U.S. Bank National Association, not in
its individual capacity but solely as indenture
trustee, for the holders of the CIM Trust 2020-R4,
Mortgage-Backed Notes, Series 2020-R4
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Patricia A Brown aka Patricia Anne Brown aka Pat Brown aka Patricia A. Tucker, Debtor Select Portfolio Servicing, Inc. as servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2020- R4, Mortgage-Backed Notes, Series 2020-R4, Movant v. Patricia A Brown aka Patricia Anne Brown aka Pat Brown aka Patricia A. Tucker Kenneth E. West – Trustee, Respondents	Case No. 22-11904-elf Chapter: 13 Judge: Eric L. Frank
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CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

The undersigned counsel for Select Portfolio Servicing, Inc. as servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2020-R4, Mortgage-Backed Notes, Series 2020-R4 (“Secured Creditor”) certify that, on the date stated hereon, I caused to be served a copy of the Objection to Confirmation of Plan filed on behalf of Secured Creditor on the parties in the manner specified on the attached service list.

The type(s) of service made on the parties was: electronic notification or first-class mail, postage pre-paid. Where service is by electronic notification, the address of the party is listed for identification purposes only.

EXECUTED ON: September 13, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
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Service by NEF

Trustee

KENNETH E. WEST
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Debtor's Counsel

RONALD J. PRESSLEY
Ronald J. Pressley, Esquire
1015 Chestnut Street
Suite 907
Suite 907
Philadelphia, PA 19107

U.S. Trustee

Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Service by First-Class Mail

Debtor

Patricia A Brown aka Patricia Anne Brown
aka Pat Brown aka Patricia A. Tucker
4 Sweetbriar Road
Coatesville, PA 19320-6108